The Cited Srivistava et al Patent

As noted by the Examiner, the Srivistava et al. patent describes a system for generating metadata which describes a media file and for storing the generated metadata in a database along with the original media file.

Contrary to the Examiner's suggestion in Section 4 with respect to independent claims 1, 8 and 10, the Srivistava et al. patent does NOT suggest or describe means for analyzing a Web page to identify a markup tag which identifies an external media file which then described by metadata. The cited passage at column 2, lines 46-48 of the Srivistava et al. patent instead describes the metadata extractor 111 which parses <u>a media file</u> (not a Web page) to extract metadata imbedded in the media file. The Srivistava et al. patent says nothing about Web pages nor the indexing of media content imbedded in Web pages by reference.

The Examiner has conceded that Srivistava et al. do not describe the storage of the combination of the Web page and metadata annotation to form an enhanced Web page suitable for text based processing, but suggests that combining the annotation with a Web page would have obvious in view of the teaching of Sidana Patent 6,571,295, discussed next.

The Cited Sidana Patent 6,571,295

The Sidana Patent describes an arrangement which allows the user of a Web browser to add annotations to a Web page retrieved from a source server. The user-provided annotations are submitted to a second server called a "redirector" which stores the annotations and, should the user thereafter issue a request for the original Web page, the request will be instead sent to the redirector which returns an "augmented copy" of the Web page that includes the user's annotations to the user's browser. The annotations are stored at the redirector, and the original Web page on the source server is left intact (see column 4, lines 11-14 of Sidana).

The Sidana system does not analyze web pages to identify references to external media files, has no mechanism for generating annotations (metadata) that describe media files referenced in a Web page or anywh, does not store the combination of the Web page and the annotations, and does not disclose or suggest any mechanism by which text processing programs such as indexing engines can process the augmented Web page available to the user from the redirector.

2

The Proposed Combination of References

The Examiner suggests that it would have been obvious to combine the teachings of Srivistava et al. and Sidana to create the claimed invention. Reconsideration is requested.

The Srivistava et al. system is devoted to creating and storing metadata describing media files in the same database in which the media files are stored. The Sidana patent is devoted to permitting a user to view Web pages with user-generated annotations. The Srivistava et al. system has no need for functions performed by the Sidana system, and vice-versa. The Sidana patent is unconcerned with describing media files, and the Srivistava et al. system is unconcerned with annotating Web pages. There is nothing which would lead one skilled in the art to combine the functions performed by these two essentially unrelated systems.

And even if the systems were combined in some fashion, the result would not resemble applicants' invention as claimed. Neither of the cited references contemplates creating a Web page which includes character-based text descriptions of imbedded multimedia content so that the full meaning of Web page can be more meaningfully indexed by conventional text-processing programs. Neither of the two cited references discloses any mechanism for identifying multimedia presentations imbedded in Web pages by searching for the markup tags which identify such data, and neither reference describes any mechanism for inserting metadata describing such media content back into the Web page for storage and future processing. Methods and apparatus for performing those functions are described only in applicants' disclosure. Modifying either of the cited prior art systems to incorporate the teachings of the other would not yield the invention claimed.

Applicants' accordingly respectfully request reconsideration of the rejection of claims 1-17 based on the proposed combination of the teachings of the Srivistava et al. patent and the Sidana patent. For the reasons presented above, the references relied upon by the Examiner, whether considered singly or in combination, fail to disclose or suggest the subject matter set forth in claims 1-17, and no logical combination of the teachings of these references would yield the subject matter claimed.

Allowance of claims 1-17 is requested.

Respectfully submitted

Dated: September, 23 2003   Charles G. Call, Reg. 20,406

3